

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY

Plaintiff,

-against-

MICROSOFT CORPORATION, *et al.*,

Defendants.

No. 1:23-cv-11195-SHS-OTW

**AFFIDAVIT OF DANIEL JORDAN IN
SUPPORT OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

DAILY NEWS, *et al.*,

Plaintiff,

-against-

MICROSOFT CORPORATION, *et al.*,

Defendants.

No. 1:24-cv-3285-SHS-OTW

THE CENTER FOR INVESTIGATIVE
REPORTING, INC.,

Plaintiff,

-against-

OPENAI, INC., *et al.*,

Defendants.

No. 1:24-cv-04872-SHS-OTW

I, Daniel Jordan, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am an associate at the law firm of Lewis Llewellyn LLP, and I am counsel for Defendants OpenAI Inc., OpenAI LP, OpenAI LLC, OpenAI GP LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation LLC, and OpenAI Holdings LLC (collectively, “OpenAI”) in the above-captioned matters.

2. I respectfully submit this declaration in support of my Motion to Admit Counsel *Pro Hac Vice* (“Motion”).

3. I am a member in good standing of the Bar of California and was admitted on December 14, 2016.

4. I am a member in good standing of the Bar of Texas and was admitted on May 19, 2022.

5. I attach a certificate of good standing from the Supreme Court of California, which was issued within thirty days of this filing, as Exhibit A to my Motion.

6. I attach a certificate of good standing from the Supreme Court of Texas, which was issued within thirty days of this filing, as Exhibit B to my Motion.

7. I have never been convicted of a felony or been the subject of any criminal conviction.

8. I have never been censured, suspended, disbarred or denied admission or readmission by any court.

9. I have never been the subject of a disciplinary sanction and there are no disciplinary proceedings presently pending against me.

Wherefore your declarant respectfully submits that he be permitted to appear as counsel *pro hac vice* in the above-captioned matters on behalf of OpenAI.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 31, 2025

Daniel Joshi Jordan

Daniel Jordan

Sworn and subscribed to before
me this 31st day of January, 2025



Eric Gilliam

Electronic Notary Public

Notary Public Eric Gilliam

Notarized remotely online using communication technology via Proof.